

September 18, 2018

The Honorable Elaine L. Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Secretary Chao and Acting Administrator Wheeler:

The Environmental Protection Agency and National Highway Traffic Safety Administration (collectively, the Agencies) have proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks, requesting comment on or before October 23, 2018 regarding a range of proposed Corporate Average Fuel Economy (CAFE) and Greenhouse Gas (GHG) standards for light-duty vehicles. 83 *Fed. Reg.* 42,986 (Aug. 24, 2018).

The Edison Electric Institute (EEI), the National Rural Electric Cooperative Association (NRECA), the National Association of Manufacturers (NAM), the Electric Drive Transportation Association (EDTA), and the American Public Power Association (APPA) (collectively, the Associations), request that the Agencies extend the public comment period on the SAFE Vehicles Rule by 60 additional days to allow the Associations and organizations in which they participate to further evaluate the Agencies' proposal and provide comments. The proposed SAFE Vehicles Rule contains numerous novel and complex technical and environmental impact analyses that the Associations and their members are actively evaluating. Additional time will benefit the Associations and their members in developing comments on the Rule's highly technical and complex issues that the Agencies can utilize towards a final rulemaking. Accordingly, we believe an extension of the comment period is both warranted and reasonable.

Sincerely,

Edison Electric Institute
National Rural Electric Cooperative Association
National Association of Manufacturers
Electric Drive Transportation Association
American Public Power Association

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The Edison Electric Institute (EEI) is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for about 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 60 international electric companies, with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

The National Rural Electric Cooperative Association (NRECA) is the national service organization for more than 900 not-for-profit electric utilities that provide electricity service to approximately 42 million consumers. NRECA members own and maintain 2.6 million miles, or 42 percent, of the nation's electric distribution lines and account for 11 percent of the total kilowatt-hours in the U.S. each year. With a commitment to contribute to the vitality and prosperity of the communities served by our members, electric cooperatives are dedicated to a healthy environment, building vibrant rural communities, and providing reliable and affordable electricity to our cooperative consumer.

The National Association of Manufacturers (NAM) is the largest manufacturing association in the United States, representing small and large manufacturers in every industrial sector and in all 50 states. Manufacturing employs more than 12 million men and women, contributes \$2.25 trillion to the U.S. economy annually, has the largest economic impact of any major sector and accounts for more than three-quarters of all private-sector research and development in the nation. The NAM is the powerful voice of the manufacturing community and the leading advocate for a policy agenda that helps manufacturers compete in the global economy and create jobs across the United States.

The Electric Drive Transportation Association (EDTA) is the cross-industry trade association promoting the advancement of electric drive technology and electrified transportation. EDTA membership includes the entire electric drive value chain – including established and emerging vehicle, battery and component manufacturers, as well as electricity providers, smart grid and infrastructure developers.

The American Public Power Association (APPA) is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. We represent public power before the federal government to protect the interests of the more than 49 million people that public power utilities serve, and the 93,000 people they employ. Our association advocates and advises on electricity policy, technology, trends, training, and operations. Our members strengthen their communities by providing superior service, engaging citizens, and instilling pride in community-owned power.